

# NRC INSPECTION MANUAL

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## PART 9900: 10 CFR GUIDANCE

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50B\_II.CFR

### 10 CFR 50, APPENDIX B, CRITERION II MAINTENANCE OF PROFICIENCY FOR PERSONNEL PERFORMING ACTIVITIES AFFECTING QUALITY

#### A. PURPOSE

To provide guidance to inspection personnel concerning an acceptable method that may be used by licensees for assuring the proficiency of personnel performing activities affecting quality.

#### B. DISCUSSION

10 CFR 50, Appendix B, Criterion II, Quality Assurance (QA) Program requires the licensee and his agent(s) to assure the proficiency of individuals who perform activities affecting quality. Criterion II states, in part, that the QA Program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. Criterion V requires the licensee to implement instructions which address how the licensee will satisfy the requirements discussed in Criterion II. Current NRC quality assurance guidance which is discussed in Regulatory Guides 1.28 and 1.33, provides limited guidance on how to establish an acceptable method for assuring that the proficiency of all individuals who perform activities affecting quality is maintained. This current guidance is generally limited to a certain number of QA, QC and operational job descriptions. Therefore, it is left to the licensee and his agents to decide on how to satisfy these criteria for the many other individuals who perform activities affecting quality. Based on available NRC information and with the exception of initial indoctrination and training, little guidance is provided to the licensee or his agents concerning the type of QA program instructions which are necessary to demonstrate his plans for satisfying the "Maintenance of Proficiency" requirement for the numerous and varying job description positions involved during the design, construction, fabrication, installation and operation phases of the nuclear power plant.

#### C. NRC STAFF POSITION

The following NRC staff position provides an acceptable method for use in satisfying the 10 CFR 50, Appendix B, Criterion II requirements relative to the maintenance of proficiency.

Except as otherwise clarified by NRC regulations, guidance, or conditions of a license for specific job descriptions or activities, licensee QA programs should

have instructions comparable to the following for ensuring that all individuals who perform activities affecting the quality of the installation or operation of a nuclear power plant have maintained the required proficiency.

Appropriate levels of management are responsible for monitoring the performance of the individuals involved in activities affecting quality and for determining the need for retraining and/or replacement. Periodic personnel appraisal and evaluation systems generally implemented on an annual basis are normally in place and could be used by licensee management to satisfy this requirement in accordance with Criterion II of Appendix B. QA program instructions should identify and discuss or reference the system that will be used to address the Criterion II maintenance of proficiency requirement. Matters germane to the assessment, such as the following, should be considered:

1. Changes in requirements, policies and procedures applicable to the activity being performed.
2. Whether personnel skills are commensurate with increased technical or administrative assignments.
3. Effect of changes in assignment or an extensive break in assignment.
4. Results of audits and inspections conducted to verify whether activities are being performed in accordance with established procedures and instruction.
5. For craft personnel employed for completion of construction or modification activities, the evaluation should address applicable factors such as: the extent of training received in acquiring a journeyman craft card; the completion of on-the-job indoctrination, training and specific qualification requirements; and the continuous nature of employment at a nuclear site have in demonstrating that a craft individual has maintained the proficiency required to perform his work activity in accordance with work performance standards established for nuclear power plants.

Documentation relative to the results of the assessment or evaluation conducted to satisfy the Criterion II requirement should be maintained in accordance with NRC guidance established or proposed under current revisions of RG 1.88, RG 1.28, RG 1.33 for "programmatic records."

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